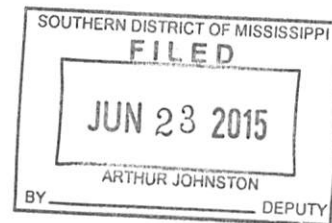


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. **1:15cr46LG-JCG**

WILLIE EUGENE RUSSELL

21 U.S.C. § 846
21 U.S.C. § 841(a)(1)

The Grand Jury charges:

COUNT 1

That beginning at least as early as June 2012, and continuing up to the date of this Indictment, in Harrison County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **WILLIE EUGENE RUSSELL**, did knowingly conspire with others both known and unknown to the Grand Jury, to possess with intent to distribute in excess of 5 kilograms of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II narcotic drug controlled substance, as prohibited by Section 841(a)(1), Title 21, United States Code.

All in violation of Section 846, Title 21, United States Code.

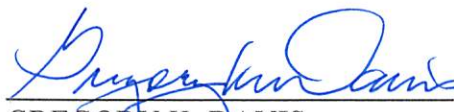
COUNT 2

That on or about April 16, 2015 in Harrison County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **WILLIE EUGENE RUSSELL**, aided and abetted by others, known and unknown, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II narcotic drug controlled substance, in violation of Section 841(a)(1), Title 21, United States Code and Section 2, United States Code, Title 18.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 853, Title 21, United States Code.


GREGORY K. DAVIS
United States Attorney

A TRUE BILL:

Redacted Signature
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 23rd day of June, 2015.


UNITED STATES MAGISTRATE JUDGE